

EXHIBIT "A" Pages 1 - 12

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
(San Francisco Division)

In re
Carl Wescott and Monette Stephens
Debtors,

} Case No. 12-30143
Declaration of Monette Stephens
of Compliance with Court Order
Regarding 2004 Order for Documents
dated April, 2012

I, Monette Rosemarie Stephens, declare:

I am one of the debtors named herein above. I know the information contained herein of my own personal knowledge, unless set forth on information and belief, and as to that matter I believe it to be true. If called as a witness I could testify competently thereto. I have reviewed the response for documents signed on behalf of myself and my husband by attorneys Neil Ison and Brian Williams. As to those responses I state further as set forth herein below:

1. Your Federal and State Income tax returns for the years 2009, 2010 and 2011.

I am informed and believe that the 2009 federal and state tax returns in PDF format, the 2010 and 2011 state tax returns in physical hard copy format have been produced. I have worked with the accountant, Leo Zendejas, for the completion of the 2010 federal tax returns and the 2011 federal returns.

I do not have personal access to all of the information necessary to complete those returns, as that information relates to business entities in the control of my husband. Except

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1 as to the documents either previously tendered and listed herein, and/or material produced
2 or taken on September 5, 2012, I do not have possession and control of documents responsive
3 to this demand. I am informed that previously produced matter includes at least the
4 following:

- 5 • 2010 Wescott & Stephens California Tax Return 05-08-12.pdf
- 6 • 2009 Wescott & Stephens CA Tax Return.pdf

7 Additionally I can not state categorically that materials taken by the Trustee's
8 attorney, from my home on September 5th, were not responsive to this demand. Except as so
9 identified I have made a diligent search and have produced all of the documents responsive to
this demand.

10 2. **Any and all documents consisting of or relating to Your Federal and State
11 Income tax returns, for the years 2009, 2010 and 2011, including but not
12 limited to worksheets, communications with accountants, 1099 statements.**

13 On September 5, 2012 I produced further documents to the Trustee's attorney relating
14 to information I control, which information was used in the preparation of or information
15 regarding me and my income for the tax returns for tax years 2009, 2010 and 2011.

16 Included amongst the information and documents produced by me are the following:

17 - 2008 and 2009 taxes preparation documents (1098's, 1099's, K1's and other related
18 documents) and Federal and CA taxes for Monette Stephens and Carl Wescott and CA taxes for
Atlas Consulting LLC;

19 - 2010 and 2011 tax preparation documents and copies of CA taxes for Monette Stephens
20 and Carl Wescott and Atlas Consulting LLC, (which is included as a Schedule in the Federal
filing);

21 - A document identified to me as the "Transmutation agreement" as had been provided to
22 me and which I have been informed is not a final document. I have no other signed copy of said
23 document;

24 - All copies that I could find of various Wells Fargo Bank Statements; and

25 - All copies of Estate Planning Documents in my possession and control.

26 I have also previously personally directed Leo Zendejas to forward all documents
27 which may have been in his possession and responsive to this demand to the trustee.

28 I am informed and believe that the following documents were produced by prior

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1 counsel in digital or pdf format, including:

2 • 2011 Federal Tax Extension for Wescott-Stephens.pdf

3 • Santa Barbara Tech Group (SBTG) 2011 K-1.pdf

4 • SBTG 2010 K-1.pdf

5 • FTB Letter.pdf

6 • IRS Letter.pdf

7 • 2009 Wescott & Stephens California Tax Return.pdf

8 • CA 2009 Form 540.pdf

9 • 2009 Automatic Extension Acknowledgment .pdf

10 • Unsigned beach house contract.jpg

11 • 430 Scenic Appraisal.pdf

12 • OrovilleAppraisal.pdf

13 • Co-Own 162 Glen Court.doc

14 • 162 Glen Court Appraisal.pdf

15 • Second Glen Court Appraisal.pdf

16 • Newforth Complete Return 2011.pdf

17 • Newforth Complete Return 2010.pdf

18 • Newforth Complete Return 2009.pdf

19 • 7950 Hearst Appraisal.pdf

20 • 7950 Hearst Copy of Note.tif

21 • Ashbury Appraisal.pdf

22 • 5760 Chemise Appraisal.pdf

23 • Rankin Loan Agreement.pdf

24 • Straight Note from Jeremy Smith.pdf

25 • Mendocino Secured Tax Statements.pdf

26 • 1352 Leonard Appraisal

27 • Stipulated Kirk Settlement Appendix A.pdf

28 • Stipulated Kirk Settlement.pdf

• Stipulated Kirk Judgment.pdf

• 3033 Shattuck Buyer Final Closing Statement.pdf

• 3033 Shattuck Appraisal.pdf

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1 • 3033 Shattuck Appraisal Fee.pdf
2 • 3033 Shattuck Lease Agreement.pdf
3 • Suneet Singal Judgment.doc

4 I am also informed that the Trustee has been provided with a copy of the 2011
5 California State Tax as filed. Also on September 5th I produced both originals and copy of the
6 following materials to the Trustee's attorney which were also in response to this demand, to
7 wit:

8 The Wescott Stephens Revocable Living Trust, Will, and Health Care Directives
9 Documents used for 2008 Taxes:

10 - General Information sheet
11 - Steve Haggard Letter
12 - Schedules and Worksheets
13 - Individual Return for Carl Wescott
14 and Monette Stephens (CA and
15 Federal)
16 - Newforth LLC Partnership return
17 and K1's
18 - Information Request from 2008 IRS
19 audit
20 - Atlas Consulting Franchise Tax
21 Check copy
22 - Copy of check from Newforth to
23 Atlas from 2008

24 Documents used for 2009 Taxes:

25 - ACT gift contribution
26 - Chase 1098's - 3 different
27 mortgages xxxx5111, xxxx3274,
28 xxxx4502
29 - Aurora Loan Services statement
30 xxxx2430

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1 - Wells Fargo 1099 xxx7024 and
2 xxxx5247
3 - CITI Mortgage 1099 xxxx7755
4 - ASC 1099 xxxx6688
5 - Wells Fargo 1099 xxx7472
6 - Chase 1098 xxxx2243
7 - Luther Burbank tax statement
8 xxxx2688
9 - CITI 1098 xxxx7755
10 - ASC 1098 xxxx6688
11 - Wells Fargo 1099 zzzz4825
12 - Chase 1098 xxxx7257
13 - Chase 1098 xxxx2967
14 - Chase 1098 xxxx5244
15 - 1099 for Carl, can't read clearly
16 - LHJS Investments LLC 1098
17 xxxx9274
18 - Lafayette Capital Group, Inc 1098
19 xxxxA001
20 - Chase 1098 xxxx8568
21 - Chase 1098 xxxx3656
22 - PLM Lender Services Stmt
23 xxxx959A
24 - PLM Lender Services letter and
25 1098 xxxx959A
26 - Empire Mortgage 1098 xxxx1402
27 - Aurora Loan Services 1098
28 xxxx2430

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1 - GMAC 1098 xxxx3045
2 - HMW IRREV Trust 1099 forms
3 xxxx3045 (CW Trustee)
4 - E&O Larkspur K1
5 - Newforth Partner K1
6 - SBTG K1
7 - Catamount Ventures K1
8 - Fidelity CAP IV K1
9 - Steve Haggard Letter and CA Atlas
10 Return
11 - SBTG Letter
12 - Extension letter for Monette
13 Stephens and Carl Wescott
14 - Atlas Consulting Return
15 Authorization
16 - Turbo Tax 2009 Amended Federal
17 Return
18 - 2009 Letter to IRS explanation
19 - 2009 Federal Return
20 - Wells Fargo 1099 xxxx8664
21 - CITI 1099 xxxx7755
22 - ASC 1099 xxxx6688
23 - ASC 1098 xxxx6688
24 - GMAC 1098 xxxx3045
25 - Joyce Wescott 1099
26 - Jack Lance 1099
27 - Robert Lonsdale 1099
28 - John Schrader 1099

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1 - Wells 1098 xxxx7472
2 - Wells 1098 xxxx8664
3 - Wells 1098 xxxx4825
4 - 1099 Cage Entertainment, Inc
5 - Medical Bills
6 - Atlas P&L
7 - E & O K1
8 - Newforth K1 and partnership return
9 - SBTG K1
10 - Fidelity CAP IV K1
11 - Fidelity CAP V K1
12 - Catamount K1 and Financial
13 statement
14 - Rainforest Capital LLC K1
15 - Fidelity CAP VI K1
16 - GGH&C Financial Statement
17 - IRS Letter
18 - 2009 1040 and
19 Transmutation Agreement
20 Documents used for 2010 Taxes:
21 - ASC 1098 xxxx6688
22 - Chase 1098 xxxx3274
23 - Chase 1098 xxxx3656
24 - Wells 1098 xxxx7472
25 - Wells 1098 xxxx4856
26 - Wells 1098 xxxx4825
27 - Rainforest Capital 1099 Carl
28 Wescott

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1 - Sterling Savings Bank 1098
2 xxxx9001
3 - Rainforest Capital 1099 Monette
4 Stephens
5 - Rainforest Capital 1099 Pook
6 Snook Dook LP
7 - CITI Mortgages 1099 xxxx7755
8 - ASC 1099 xxxx6688
9 - Atlas Consulting P&L
10 - Atlas Car Purchase Document
11 - Chase 1098 xxxx4502
12 - Chase Annual Escrow Statement
13 xxxx4502
14 - Chase 1098 xxxx5111
15 - Chase 1098 xxxx2967
16 - Chase 1098 xxxx8568
17 - Chase 1098 xxxx2243
18 - Citimortgage 1098 xxxx7755
19 - PLM Lender Services Borrower
20 Statement
21 - SBTG K1
22 - Rainforest Capital K1
23 - Parcel 2010-2011 057-131-09-00
24 Secured Tax Statement
25 - Parcel 2011- 2012 057-131-09-00
26 Secured Tax Statement
27 - SF Secured Property Tax Bill 2010
28 Documents used for 2011 Taxes:
- Mendocino County Secured Tax
Bill Parcel 047-220-32

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1 - Napa Secured Tax Statement Asmt
2 Number 032-171-031-000
3 - Rainforest Capital K1
4 - 7004 Extension for 1083
5 Mississippi St. LLC
6 - Surprise Development Notice of
7 Balance Due
8 - SF Secured Property Tax Bill 2011
9 - 2012
10 - Current Secured Reminder Notice
11 2010-2011 010-180-007-000
12 - BaySierra Financial 1099 xxx5769
13 - State Income Tax Refund
14 - Form 1096
15 - County of Mendocino Letters (10)
16 of Delinquent taxes
17 - Turbotax purchase receipt
18 - Newforth 1099
19 - CBT Atlas LLC Statement July 2011
20 - Letter to Franchise Tax Board
21 - 2011 CA State return
22 - SBTG K1
23 - Catamount K1
24 - Rainforest Capital K1
25 - JPMorgan Chase 1098 xxxx3656
26 - Chase 1099-C xxxx2243
27 - Newforth Partners LLC K1
28 - E-MAIL from Leo Zendejas

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1 - Luther Burbank 1098 xxxx2688
2 - Wells Fargo 1098 xxxx7472
3 - Wells Fargo 1098 xxxx7472
4 - Wells Fargo 1098 xxxx4856
5 - Wells Fargo 1098 xxxx4825
6 - CITI Mortgage 1099 xxxx7755
7 - Chase 1099-C xxxx2243
8 - PLM Lender 1099-C xxxx959A
9 - PLM Lender Borrow Statement
10 xxxx959A
11 - Catamount K1
12 - Fidelity CAP VI K1
13 - Fidelity CAP IV K1
14 - Fidelity CAP V K1
15 - 4868 Extension of time form
16 - Wells Fargo Bank Statements.

17 In addition I can not state categorically that materials taken by the Trustee's attorney
18 on September 5th were not responsive to this demand. Except as so identified I have made a
19 diligent search and have produced all of the documents in my control responsive to this
20 demand

21 **3. All of your QuickBooks files for any entity that
22 you owned or controlled with the last 4 years.**

23 Except as to the documents previously tendered by prior counsel I have made a
24 diligent search and do not have possession and/or control of any other materials responsive to
25 this demand.

26 I am informed and believe that the following documents had been sent to the Trustee
27 by Messrs: Ison and Williams:

28 To date the QuickBooks that have been located include

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1 PeopleBridge, Inc., and Atlas Consulting, LLC. as follows:

2 • Atlas SB (Backup May 11,2012 11 23 PM.QBB)
3 • PeopleBridge_2009.QBW.ADR

4 **4. Any and all bank statements and canceled checks of yours from (1) personal
5 checking and (2) personal savings for 2010 through the present.**

6 I am informed and believe that the following documents had been sent to the Trustee
7 by Messrs: Ison and Williams:

8 • Joint Wells Fargo Checking Acct xxx236.pdf
9 • Monette Personal California Bank and Trust Checking.pdf
10 • Monette Personal Montecito Bank and Trust Checking.pdf
11 • U.S. Bank and Trust Joint.tif
12 • Monette Montecito Savings 1_10 to 8_10.tif
13 • Monette Montecito Savings 9_10 to 12_11.tif
14 • Monette Montecito Savings 7_22_2011.pdf
15 • Monette Montecito Savings 2_24_2012.pdf
16 • Monette Montecito Savings 3_23_2012.pdf
17 • Monette Montecito Savings 4_24_2012.pdf

18 On September 5th I also produced Bank Statements including the following:

19 • Wells Fargo PMA Checking Account x5228 11/11;
20 • Wells Fargo Pook Snook Dook acct xxxx1374 9/11, 10/11; and
21 • CBT Atlas Check copies.

22 I also can not state categorically that materials taken by the Trustee's attorney on
23 September 5th were not responsive to this demand. Therefore except as so identified I have
24 made a diligent search and have produced all of the documents responsive to this demand.

25 **5. Any and all bank statements and canceled checks of
26 yours from rental property from 2010 through the present.**

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1 Except as to the documents previously tendered I have made a diligent search and
2 have not found any other document responsive to this demand. Further I can not state
3 categorically that materials taken by the Trustee's attorney on September 5 were not
4 responsive to this demand. Except as so identified I have no current knowledge of other
5 materials responsive hereto. I am continuing to search but know of no other matter
6 responsive to this demand.

7 **6. Any and all documents of yours regarding Livery S.A.**

8 Except as to the documents previously tendered I do not have possession or control of
9 documents responsive to this demand nor do I have an interest, except to the extent that I
10 can claim a community property interest in any property interest claimed by my husband, in
11 said entity, so that the phrasing of this demand does not apply to me.

12 I have made a diligent search and do not have possession and/or control of documents
13 responsive to this demand. Further, I was present at my home when the Trustee's attorney
14 went through materials identified as belonging to my husband and I saw her take documents
15 and materials which were neither identified or categorized by her. I have not received any
16 identification of those materials and can not state categorically that materials taken by said
17 attorney were not responsive to this demand. Except as so identified I have made a diligent
18 search and have produced all documents that I had possession and control of in response to
19 this demand.

20 **7. Any and all documents of yours regarding property bought or sold or
21 transferred in Honduras.**

22 Except as to the documents previously tendered I do not have possession or control of
23 documents responsive to this demand. Nor do I have an interest, except to the extent that I
24 can claim a community property interest, in any such property. Unless said interest is claimed
25 by my husband in said entity, if any, making the demand ambiguous as directed to me
26 personally. I can not state categorically that materials taken by the Trustee's attorney on
27 September 5th were not responsive to this demand. Therefore except as so identified I have
28 made a diligent search and to the extent that documents have previously been provided
and/or that I have produced are responsive to this demand or as may have been taken by the
Trustee's counsel without identification I have no other material responsive to this demand.